

Fill in this information to identify the case:

Debtor 1 Deanne Jones

Debtor 2 James Jones
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA

Case number 18-21950 GLT

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: PNC BANK, NATIONAL ASSOCIATION

Court claim no. (if known): 16-1

Last 4 digits of any number you use to identify the debtor's account: 3748

Property address:

578 Route 917
Scenery Hill, PA 15360

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: The loan was due for the 8/1/2023 at the time of hand off from the Trustee. The loan is currently due for the 11/1/2023 payment.

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:

(a) \$ _____

b. Total fees, charges, expenses, escrow, and costs outstanding:

+ (b) \$ _____

c. **Total.** Add lines a and b.

(c) \$ _____

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor(s) Deanne Jones and James Jones
First Name Middle Name Last Name

Case Number (if known): 18-21950 GLT

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

***s/Brian C. Nicholas (Atty ID: 317240)**

Date 10/17/2023

Brian Nicholas
17 Oct 2023, 12:38:11, EDT

KML Law Group, P.C.
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Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: James Jones
Deanne Jones**

Debtor(s)

**PNC BANK, NATIONAL
ASSOCIATION**

Movant

vs.

**James Jones
Deanne Jones**

Debtor(s)

Ronda J. Winnecour,

Trustee

BK NO. 18-21950 GLT

Chapter 13

Related to Claim No. 16-1

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brian C. Nicholas of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on October 17, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)
Deanne Jones
578 Route 917
Scenery Hill, PA 15360

James Jones
578 Route 917
Scenery Hill, PA 15360

Attorney for Debtor(s) (via ECF)
Paul W. McElrath, Jr.
McElrath Legal Holdings, LLC.
1641 Saw Mill Run Boulevard
Pittsburgh, PA 15210

Trustee (via ECF)
Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: October 17, 2023

/s/ Brian C. Nicholas
Brian C. Nicholas Esquire
Attorney I.D. 317240
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-5366
bnicholad@kmlawgroup.com